# EXHIBIT 19

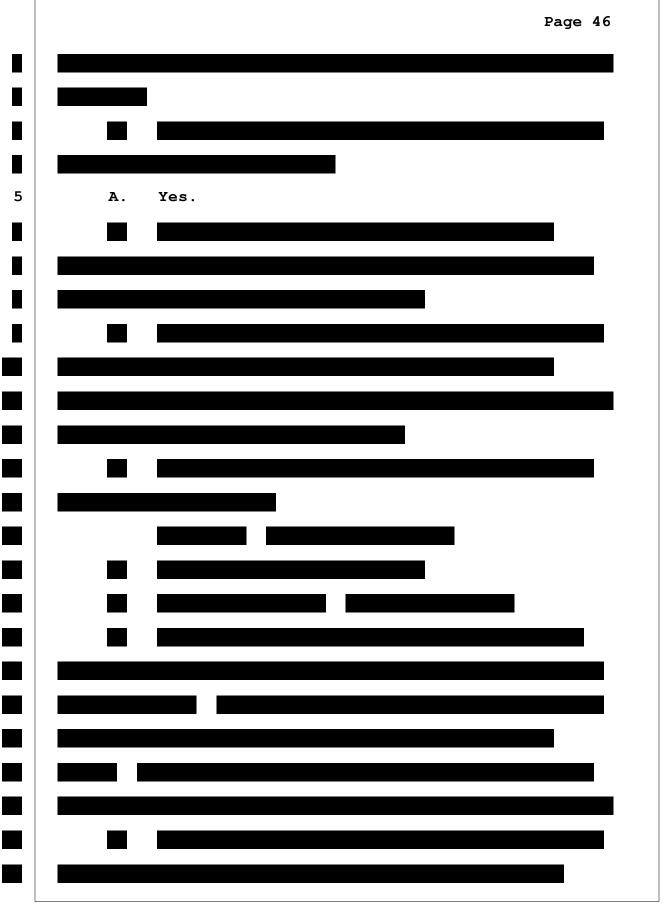
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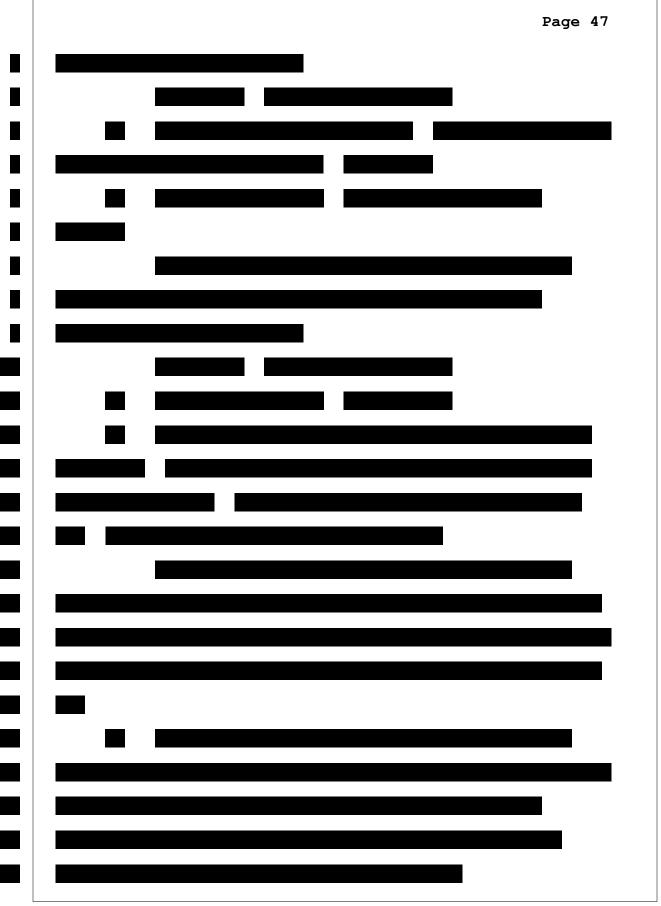
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UNITED STATES DISTRICT COURT	
FOR THE WESTERN DISTRICT OF WASHINGTON	
AT SEATTLE	
In Re: )	
)	
) No. 2:21-cv-00563-JCC	
VALVE ANTITRUST LITIGATION )	
)	
VIDEO-RECORDED DEPOSITION UPON ORAL EXAMINATION OF	
KASSIDY GERBER	
*** HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY ***	
9:05 A.M.	
THURSDAY, OCTOBER 5, 2023	
701 FIFTH AVENUE, SUITE 5100	
701 FIFTH AVENUE, SUITE 5100 SEATTLE, WASHINGTON	
SEATTLE, WASHINGTON	

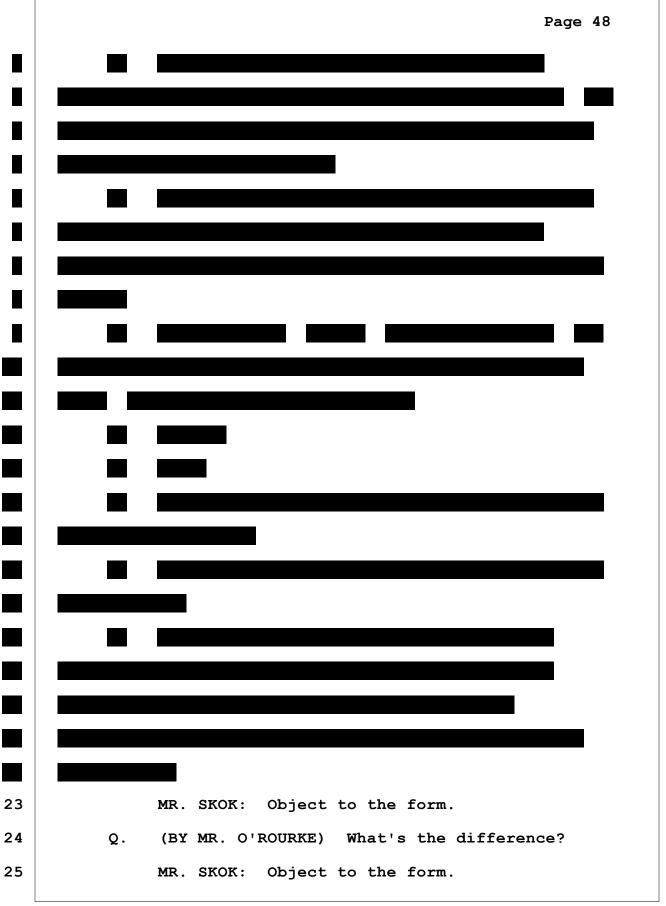
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1	have you had any kind of training on any topic that you
2	understood to relate to antitrust?
3	MR. SKOK: And, again, Ms. Gerber, to the
4	extent you can answer this without disclosing
5	attorney-client communications, you may. But to the
6	extent that he's asking you about the content of
7	communications you've had with lawyers, that's
8	attorney-client privilege, so please don't disclose
9	that.
LO	THE WITNESS: Okay.
L1	Q. (BY MR. O'ROURKE) So it's a yes-or-no
L2	question. Either you've had the training or you have
L3	not.
L 4	MR. SKOK: Well, to the extent that she's had
L5	those communications with lawyers, you're asking about
L 6	the substance of those attorney-client communications.
L 7	That's the type of communication that I'm
18	instructing you not to answer.
L 9	THE WITNESS: Okay.
20	Q. (BY MR. O'ROURKE) Your answer?
21	A. I'm not going to answer.
22	Q. You're refusing to answer?
23	A. Yes.
24	MR. SKOK: Well, she's been instructed not to
25	answer. I think she's following counsel's instructions.

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1	MR. O'ROURKE: So just so we're very clear,			
2	Mr. Skok			
3	MR. SKOK: Skok, please. Skok.			
4	MR. O'ROURKE: Skok. Thank you.			
5	MR. SKOK: Thank you.			
6	MR. O'ROURKE: You the position you're			
7	taking now in instructing the witness not to answer is,			
8	I am not permitted to ask an employee of Valve whether			
9	or not that employee has had compliance training on			
10	antitrust?			
11	MR. SKOK: No. The question is asking for the			
12	substance of what kind of training she may have had by			
13	counsel. To the extent there's a training by counsel,			
14	that would disclose the substance of attorney-client			
15	communications. The instruction is not to answer in a			
16	way that discloses the substance of attorney-client			
17	communications. I did tell the witness if she can			
18	answer otherwise, then she's free to.			
19	Q. (BY MR. O'ROURKE) My question is: Have			
20	you during the time you've worked at Valve, about 11			
21	and a half years, have you had training on antitrust			
22	compliance?			
23	MR. SKOK: And the same instructions,			
24	Ms. Gerber.			
25	Q. (BY MR. O'ROURKE) You need to answer.			

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1	A. No. I'm not answering.
2	MR. SCHENCK: Why don't we take a break, see
3	if we can figure this out.
4	MR. SKOK: Yeah. It's probably a good time
5	for a break to consult on some of these issues
6	MR. O'ROURKE: Take a break.
7	MR. SKOK: as well as we've been going
8	about an hour.
9	THE VIDEOGRAPHER: The time is 9:56 a.m. And
10	we're going off the record.
11	(Brief break taken.)
12	THE VIDEOGRAPHER: The time is 10:09 a.m. And
13	we're back on the record.
23	Q. (BY MR. O'ROURKE)







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Q. So I'm just	t trying to understand the
distinction between	the two situations, where in both
cases a Steam custome	er is buying the game and then, in
this situation, learn	ning that it's for sale at a lower
price, why does it ma	atter if the lower price is on Steam
or the lower price is	s on another online store?
A. Can you rep	peat the question.
Q. Sure.	
What's the	distinction between a Steam
customer who buys on	Steam two days before a sale on
Steam, versus the Ste	eam customer who buys on Steam and
then learns two days	later the same game is for sale at
a lower price on a di	ifferent store?
A. I don't	I don't think there is a
distinction. I think	k that's I don't have an issue
with that.	
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